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*Johnson & Johnson Health Care Systems Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON

HEALTH CARE SYSTEMS INC.,

Plaintiff,

vs.

SAVE ON SP, LLC,

Defendant.

:

Civil Action No. 22-2632(ES)(CLW)

:

Hon. Esther Salas, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J

:

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**NOTICE OF MOTION TO SEAL**

COUNSEL:

PLEASE TAKE NOTICE that on December 18, 2023 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems, Inc. (“JJHCS”) and Defendant Save On SP, LLC (“SaveOnSP”) shall jointly apply before the Honorable Cathy L. Waldor at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, to (i) permanently maintain under seal the parties’ joint letter, dated October 25, 2023, regarding JJHCS custodians and accompanying exhibits (ECF No. 165); (ii) permanently maintain under seal the parties’ joint letter, dated October 25, 2023, regarding CAP search terms and accompanying exhibits (ECF No. 166); (iii) permanently maintain under seal the transcript of the hearing of October 30, 2023 (ECF No. 171); (iv) permit the parties to file the proposed public version of ECF No. 165, attached as Exhibit A to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”); (v) permit the parties to file the proposed public version of ECF No. 166, attached as Exhibit B to the Greenbaum Declaration; (vi) permit the parties to file the proposed public version of ECF No. 171, attached as Exhibit C to the Greenbaum Declaration.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the parties will rely on the accompanying Greenbaum Declaration and indices in support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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Dated: November 21, 2023